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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**REORGANIZED DEBTORS' REPORT
ON RESPONSES TO TWELFTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (UNAUTHORIZED BULK
CLAIMS) AND REQUEST FOR ORDER
BY DEFAULT AS TO UNOPPOSED
OBJECTIONS**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

[Re: Dkt. No. 11082]

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

**Resolving Objections Set for Hearing
September 29, 2021 at 10:00 a.m. (Pacific
Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Twelfth Securities Claims Omnibus*
9 *Objection (Unauthorized Bulk Claims)* [Docket No. 11082] (the “**Twelfth Securities Claims Omnibus**
10 **Objection**”).

11 **RELIEF REQUESTED IN THE TWELFTH SECURITIES CLAIMS OMNIBUS OBJECTION**

12 The Twelfth Securities Claims Omnibus Objection seeks to disallow and expunge proofs of claim
13 that were filed in “bulk,” supposedly on behalf of PG&E security holders, by third parties who have not
14 demonstrated that they were authorized to act as agents for those PG&E security holders and therefore
15 lack standing to assert those “bulk” claims. These claims are listed in Exhibit 1 to the Twelfth Securities
16 Claims Omnibus Objection.

17 **NOTICE AND SERVICE**

18 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Twelfth Securities*
19 *Claims Omnibus Objection (Unauthorized Bulk Claims)* [Docket No. 11084] (the “**Notice of Hearing**”).
20 The Twelfth Securities Claims Omnibus Objection was supported by the *Declaration of Edward J.*
21 *Radetich, Jr. in Support of Reorganized Debtors’ Twelfth Securities Claims Omnibus Objection*
22 *(Unauthorized Bulk Claims)* [Docket No. 11083] (the “**Radetich Declaration**”). The Twelfth Securities
23 Claims Omnibus Objection, the Notice of Hearing, and the Radetich Declaration were served as
24 described in the *Certificate of Service* of Victor Wong, filed on August 24, 2021 [Docket No. 11140]
25 (the “**Certificate of Service**”). As further described in the Certificate of Service, on August 18, 2021,
26 each holder of a claim listed on Exhibit 1 to the Twelfth Securities Claims Omnibus Objection received
27 a notice including the claim number, debtor, claim amount and priority, and the basis for Reorganized
28 Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Twelfth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

| Docket No. | Third Party Filer | Claim Nos. | Resolution |
|------------|--------------------------------|---|---|
| Informal | Dianna Harrison - CPA | 98742, 104029, 104644, 104651, 104653, 104715, 105060, 105224, 105226, 105227, 105228, 105229, 105230, 105290, 105291, 105293, 105295, 105296, 105288, 105289, 105292, 105294, 105297, 105299, 105300, 105474, 105476, 105481, 105484, 105491, 105492, 105429, 105511, 105517, 105461 | The Twelfth Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims, and these Claims have been removed from Exhibit A to this Request. The Reorganized Debtors reserve the right to object to these Claims in a future Omnibus Objection on any basis. |
| Informal | MN Services Vermogensbeheer | 102260, 102351, 102404 | The Twelfth Securities Claims Omnibus Objection has been WITHDRAWN without prejudice with respect to these Claims, and these Claims have been removed from Exhibit A to this Request. The Reorganized Debtors reserve the right to object to these Claims in a future Omnibus Objection on any basis. |

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- I am a partner with the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for the Reorganized Debtors.
- The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Twelfth Securities Claims Omnibus Objection except as described herein.

1 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and
2 expunging the proofs of claim listed in the column headed "Claims to be Disallowed/Expunged" in
3 **Exhibit A** to this Request, which listed claims identical to those in Exhibit 1 to the Twelfth Securities
4 Claims Omnibus Objection, except as otherwise discussed above.

5
6 Dated September 22, 2021

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8 **WEIL, GOTSHAL & MANGES LLP**

9 **KELLER BENVENUTTI KIM LLP**

10 By: /s/ Richard W. Slack

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12 Richard W. Slack

13 *Attorneys for Debtors and Reorganized Debtors*
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